

<p>UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK</p> <p>----- x</p> <p>UNITED STATES OF AMERICA</p> <p>- v.-</p> <p>HO WAN KWOK, a/k/a "Miles Guo," a/k/a "Miles Kwok," a/k/a "Guo Wengui," a/k/a "Brother Seven," a/k/a "The Principal," KIN MING JE, a/k/a "William Je," and YANPING WANG, a/k/a "Yvette,"</p> <p>Defendants.</p> <p>----- x</p>	<p>PETITION UNDER FED. R. CRIM. P. 32.2 AND 21 U.S.C. § 853(n) FOR ADJUDICATION OF PETITIONER'S RIGHT TO SPECIFIC PROPERTY OF [\$70,168.00]</p> <p>S1 23 CR 118 (AT)</p>
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I, Lingli Li (the "Petitioner"), pursuant to 21 U.S.C. § 853(n) and Rule 32.2(c) of the Federal Rules of Criminal Procedure, hereby respectfully petitions the Court for a determination of the Petitioner's interest in specific property subject to the Court's Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, signed by Your Honor on January 6, 2025 and entered on January 7, 2025, (the "Forfeiture Order") which includes various bank accounts ("Forfeited Accounts"), Dkt. 488, to exclude all property in which the Petitioner has right, title, and interest, namely, \$70,168.00 (the "Property"). In support hereof, the Petitioner states as follows:

1. Between 2020 to 2021, I, the Petitioner wired \$70,168.00 in total to participate in the projects.
2. I, the Petitioner transferred U.S. currency to the Forfeited Accounts as below :
3. On October 14, 2020- wired \$20,000.00 to Maywind LLC, a recipient of then Pheonix farm, for Farm loan project, Transaction number is: 52684403 Upon information and belief, these funds were seized by the government among potentially Forfeited Accounts and assets.
4. On November 19, 2020- wired \$1,020.00 to Maywind LLC, a recipient of then Pheonix farm, for Farm loan project, Transaction number is: 5264829448 Upon information and belief, these funds were seized by the government among potentially Forfeited Accounts and assets.
5. On November 19, 2020- wired \$1,064.00 to Maywind LLC, a recipient of then Pheonix farm, for Farm loan project, Transaction number is: 5268544986 Upon information and belief, these funds were seized by the government among potentially Forfeited Accounts and assets.
6. On September 4, 2021 – wired \$30,000.00 to Maywind LLC, a recipient of then Pheonix farm, for Farm loan project, Wire transfer number is: XXXXXXXX Upon information and belief, these funds were seized by the government among potentially Forfeited Accounts and assets. (Recipient Account Name: Medical supply System International; Account Number: 69233779; Street Address: 12810 N Cave Creek Rd Apt.234, Phoenix, AZ, 85032, USA

Receiving Bank Name: Wells Fargo Bank, National Association; Street Address: 1000 Louisiana St.)

7. On March 11, 2021 – wired \$18,084.00 to Superior Financial Associates INC, a recipient of then Mayflower farm, for Farm loan project, Wire transfer number is: XXXXXXXX Upon information and belief, these funds were seized by the government among potentially Forfeited Accounts and assets. (Recipient Name: Superior Financial Associates INC; Account Number: 898122702090; Address: 115 W 42<sup>ND</sup> ST, ONE BRYANT PARK NEW YORK CITY, NY 10036 US)

Transaction Type	Wire number	Total Amount	Payment Method	Recipient	Asset ID
Farm Loam	Transaction number is: 52684403 Transaction number is: 5264829448 Transaction number is: 5268544986 Account Number: 69233779	\$20,000 \$1,020 \$1,064 \$30,000	Wiring Wiring Wiring Wiring	Maywind LLC	Pheonix Farm

Transaction Type	Wire number	Total Amount	Payment Method	Recipient	Asset ID
Farm Loam	Account Number: 898122702090	\$18,084.00	Wiring	Superior Financial Associates INC	Mayflower Farm

6. I the petitioner never received any funds or investment back from the investments before they were seized by the government, having now suffered a total of unrecovered funds of my \$120,030.00 investment.

7. I, the petitioner, was not consulted prior to the entry of the Forfeiture Order. Petitioner had no knowledge that Defendant Wang consented to forfeit the Property. I invested in G|CLUBS to support the Whistleblower Movement which is led by Miles Guo. I believe that Mr. Guo is an honest person. He is simply doing the right thing to take down the CCP.

8. As an owner of the above listed assets, I, the petitioner, has an interest in the Property which Defendant Wang had no authority to agree to forfeit. Rather, Petitioner has a superior interest in the Property which cannot be the subject of the Forfeiture Order relating to Defendant Wang.

9. I was not involved in, nor did I have any knowledge of the Defendants' activities. Accordingly, I am also an innocent third party pursuant to 21 U.S.C. § 853(n). Any third party "asserting a legal interest in property which has been ordered forfeited to the United States pursuant to this section may... petition the court for a hearing to adjudicate the validity of his alleged interest in the property." 21 U.S.C. § 853(n)(2). The petition, which is sworn and signed by the me, "shall set forth the nature and extent of the petitioner's right, title, or interest in the property, the time and circumstances of the petitioner's acquisition of the right, title, or interest in the property, and additional facts supporting the petitioner's claim, and the relief sought." Id. § 853(n)(3).

10. Here, I, the petitioner is the lawful owner of the Property.

11. Alternatively, Petitioner is a bona fide purchaser for value of my interest in the Property under 21 U.S.C. § 853(n)(6)(B).

12. Petitioner was made aware of the Order of Forfeiture by viewing it at [www.forfeiture.gov](http://www.forfeiture.gov) (which was published from February 6, 2025 through March 7, 2025) noting that: "pursuant to Title 21, United States Code, Section 835(n), persons other than the defendant who wish to assert a legal interest in property that has been ordered forfeited to the United States must file a petition for a hearing to adjudicate the validity of their alleged interest in the property with the Court within thirty (30) days of the final publication of notice, or receipt of actual notice, whichever is earlier."

13. Petitioner has filed this petition within 60 days of the initial publication of notice.

WHEREFORE, Petitioner respectfully requests and petitions this Court: a. to amend the Forfeiture Order to exclude the Property in which Petitioner has a rightful interest as an innocent third party, superior interest, and/or a bona fide purchaser for value. b. A hearing pursuant to 21 U.S.C. § 853(n) on any disputed matters. c. Compensation for the value of Petitioner's interest if the Petition is denied; d. Any other relief the Court deems just and proper.

Dated: April 06, 2025

Respectfully Submitted,

Lingli Li

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Signature

VERIFICATION

I attest and declare under penalty of perjury that my petition is not frivolous, and the information provided in support of my petition is true and correct to the best of my knowledge and belief. Executed on April 06, 2025, in Dallas, TX, USA. Phone Number: 352-281-0055

Lingli Li

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Signature